

MEMO ENDORSED

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May 13, 2025

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square, Courtroom 1306
New York, NY 10007

Re: *Diaz v. New York Paving, Inc.*
Docket No. 18-CV-04910(ALC)(GWG)
MLGB File No. 09676-00110

Dear Judge Carter:

This firm represents Defendant New York Paving (“Defendant”) in the above-referenced matter. We write, with Plaintiffs’ consent, to seek a one-week adjournment of Defendant’s time to interpose Objections to Magistrate Judge Gorenstein’s Oral Order regarding Discovery issued during the parties’ discovery conference held May 1, 2025 (the “Order”) (written transcript made available as of May 7 at ECF No. 425), from May 15, 2025 until **May 22, 2025**.¹

Defendant respectfully requests this adjournment for several reasons. First, the additional time is necessary to allow the parties to prepare the materials necessary for the Joint Pre-Trial Order (initial exchanges currently due May 29, 2025), and to prepare for the status conference before Your Honor currently scheduled for May 22, 2025. In addition, several colleagues of the undersigned are out of office this week due to personal matters, and thus the attorneys who are available have several urgent conflicts on account of having to handle pressing matters on behalf of the absent attorneys. Finally, the undersigned’s colleague Ana Getiashvili, Esq. – the attorney who appeared on behalf of Defendant during the May 1 Conference and primary author of the Objections thereto – is also out of office for major portions of this week due to pressing medical issues and urgent medical appointments. As such, extending Defendant’s Objections deadline is necessary to allow Defendant to fully prepare for the other pressing obligations in this matter, as well as to account for the urgent medical and other personal issues which Defendant’s counsel must necessarily navigate this week.

¹ As noted below, Plaintiffs consent.

MELTZER LIPPE GOLDSTEIN & BREITSTONE, LLP

Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
May 13, 2025
Page 2

Pursuant to Your Honor's Individual Practices, Rule 1.D: (1) the original deadline to file Objections is no earlier than May 15, 2025, and Defendant seeks until May 22, 2025; (2) this is Defendant's first request for an adjournment of this deadline; (3) since there have been no previous requests, they have been neither granted nor denied; and (4) Plaintiffs consent to this request. As a final matter, the granting of the instant request would affect no other scheduled deadlines or dates.

As such, given Defendant's need for additional time as noted above, Defendant respectfully requests that its deadline to file Objections to the Order **be extended from May 15, 2025 to May 22, 2025.**

We thank Your Honor for your time and consideration.

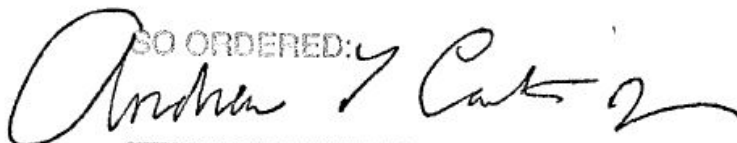
Respectfully submitted,

/s/ Christopher P. Hampton, Esq.

Christopher P. Hampton

CPH/kc

cc: All Counsel of Record (*via ECF*)

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

May 15, 2025